

UNITED STATES DISTRICT COURT  
For the  
DISTRICT OF MASSACHUSETTS

GEORGE MICHAEL DOWD,	)	
	)	
Plaintiff,	)	Civil Action No.
vs.	)	04-11925 NG
	)	
JAMES DOWD,	)	
	)	
Defendant.	)	
	)	

MOTION FOR SEPARATE JUDGMENT UNDER FED. R. CIV. P. 54(b)

Now comes your Defendant and Plaintiff in counterclaim and moves, pursuant to Fed. R. Civ. P. 54(b), for Judgment against the Plaintiff on all claims in the Plaintiff's Complaint.

The Defendant respectfully directs this Court's attention to the Memorandum filed herewith pursuant to Local Rule 7.1(B)(1). Submitted herewith is also the Movant's Certificate of Conference pursuant to Local Rule 7.1(A)(2).

Respectfully submitted,  
James Dowd  
By his attorney,

/s/ Nelson P. Lovins  
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